IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

KATHLEEN VAUGHN,	)	CASE NO.: 8:04CV208
PLAINTIFF,	)	**PLAINTIFF'S MOTION FOR WRIT OF EXECUTION**
LENAHAN LAW OFFICES, L.L.C. AND JASON STROEHLEIN,	)	
DEFENDANTS.	)	

COMES NOW, the Plaintiff, Kathleen Vaughn, by and through her attorney, Pamela A. Car, and motions this Court pursuant to Fed. R. Civ. P. Rule 69, for the issuance of a Writ of Execution upon the Nebraska Western Union account of the Defendant Lenahan Law Office.

In support of her motion, Plaintiff states as follows:

1. That on or about 7/29/04, at filing no. 11, the Court issued a Memorandum and Order partially granting the Plaintiff's Motion for Default (filing no. 7) and setting damages for hearing; on or about 7/29/04, at filing no.12, the Clerk made an Entry of Default against both Defendants herein; on or about 10/19/04, at filing no. 16, the Court entered a judgment in favor of the Plaintiff and against the Defendants in the amount of $1,000.00 as statutory damages, $250.00 for attorney fees and taxable costs with interest at the rate of 2.18 per cent; on or about 12/2/04 at filing no. 21, the Clerk taxed costs in the amount of $230.00 against the Defendants.

2. The total amount of the Judgment is $1,480.00, plus interest accruing at the statutory rate of 2.8%. No amounts have been paid or collected on said judgment to date and the current amount owes remains the same.

3. That the judgment has never been vacated or set aside and no funds have been received on said judgment.

4. That upon information and belief, Defendant Lenahan Law Office has a Western Union Account located in the state of Nebraska that Plaintiff wishes to execute upon for this judgment.

5. That upon entering the Order for Writ of Execution, Plaintiff was present the form of Writ of Execution to the Clerk's office.

WHEREFORE, the Plaintiff requests that the Court enter an Order directing the Clerk of the Court to issue a writ of execution upon the property of Defendant Lenahan Law Office as set forth herein in the amount of $1,480.00, plus accruing interest and for such other and further relief as the Court may deem appropriate.

Dated June 22, 2005

KATHLEEN VAUGHN, PLAINTIFF,

BY: *s/Pamela A. Car*

Pamela A. Car #18770
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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Plaintiff's Motion For Writ of Execution was filed electronically and served upon:

Danielle Lenahan Fanning
52 Laurelton Dr.
Buffalo, NY 14224

John Lenahan
50 Campus Dr.
Buffalo, NY 14224

By regular United States Mail, postage prepaid, on June 22, 2005.

S/Pamela A. Car